

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAP HONG CHAN,
also known as "Kevin,"
Defendant.

INDICTMENT

_____ /

The Grand Jury charges:

(Abusive Sexual Contact)

On or about October 22, 2022, in Manistee County, in Indian Country, on land held in trust by the United States for the Little River Band of Ottawa Indians, in the Southern Division of the Western District of Michigan, the defendant,

LAP HONG CHAN, a/k/a "Kevin,"

a non-Indian, knowingly engaged in sexual contact with Victim 1, an Indian female. Specifically, the defendant intentionally touched Victim 1's anus and buttocks, through clothing, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

18 U.S.C. § 2244(b)

18 U.S.C. § 2246(3)

18 U.S.C. § 1151

18 U.S.C. § 1152

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



ERIN K. LANE
Assistant United States Attorney